

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION**

York County,

Plaintiff,

vs.

Appaloosa Management, LP; DT Sports Holding, LLC; Tepper Sports Holding, Inc.; and the City of Rock Hill,

Defendants.

C/A#: 0:22-cv-02167-CMC

**PLAINTIFF YORK COUNTY'S
ANSWERS TO LOCAL RULE 26.01
INTERROGATORIES**

Plaintiff York County answers Local Civil Rule 26.01 Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER:

Plaintiff is not aware of any persons or legal entities who may have a subrogation interest in Plaintiff's claims.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER:

Plaintiff has demanded a jury trial on all claims.

(C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER:

Plaintiff is a body politic and not a publicly-owned company. Plaintiff does not have any parent corporations or other publicly-held corporations owning ten percent or more of its

stock. Plaintiff is not a parent of any publicly owned company and does not own ten percent of any publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

ANSWER:

Plaintiff filed this action in the Court of Common Pleas for York County, South Carolina in the Sixteenth Judicial Circuit. Plaintiff has filed a Motion to Remand causes of action 1-4 and will file a Motion to Remand cause of action 5 to state court because, among other reasons, federal subject matter jurisdiction does not exist.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

The underlying State Court Complaint includes five causes of action. On July 7, 2022, the Corporate Defendants removed causes of action 1 through 4 to this Court and were supplied case number 22-cv-02167-CMC. On July 22, 2022, the City of Rock Hill separately removed cause of action number 5 and was supplied case number 22-cv-02380-CMC. The Court has established a related briefing schedule concerning subject matter jurisdiction. Plaintiff has moved to remand Causes of Action 1- 4 to state court and will, likewise, seek remand of Cause of Action 5.

[Signature to Follow]

s/ Jordan M. Crapps
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